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VIA ECF

The Hon. Stewart D. Aaron
 United States District Court for the Southern District of New York
 500 Pearl St.
 New York, NY 10007

October 16, 2020

Request GRANTED on consent.
 SO ORDERED.
 Dated: 10/17/2020

Re: *Allianz, et al. v. Bank of America Corp. et al.*, 18-cv-10364-LGS *Att cl an*

Dear Judge Aaron:

On behalf of all parties in the above-referenced action, we write to request a brief extension of the deadline to submit the parties' disputes on search terms. This would move the deadline four business days from October 16, 2020 to October 22, 2020. Since the Court ordered the October 16 deadline (Dkt. 542), the parties' conferrals on search terms have been productive, and we have significantly narrowed the disputes. However, there are a handful of issues that require further global and bilateral conferrals, and having additional time would benefit the parties and the Court. This extension would not affect any other currently-scheduled deadline.

Additionally, pursuant to the Court's order dated October 2, 2020 (Dkt. 542), we write to update the Court on the status of custodial negotiations. The parties have made significant progress with regard to custodial negotiations over the past few weeks. Specifically, Plaintiffs can report that the parties have reached custodian agreements with five Defendants: BNP Paribas, MUFG, Royal Bank of Scotland, Société Générale and Standard Chartered. This agreement thus moots the pending motion to compel filed by Plaintiffs against RBS. We also continue to conduct bilateral negotiations with several defendants, including Credit Suisse, Goldman Sachs and Royal Bank of Canada. The delta on these negotiations is small, and there is a respectable chance the parties could reach agreement by the end of next week. As to the remaining Defendants, the Court has already ruled on Plaintiffs' motion to compel as to Citi, and there are currently pending motions to compel or motions for protective order that will need to be decided as to Bank of America, Barclays, Deutsche Bank, HSBC, JPMorgan, Morgan Stanley, and UBS.

Respectfully submitted,

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⁴ Eversheds Sutherland (US) LLP only represents Standard Chartered Bank with respect to claims by AllianzGI GmbH, the Allianz Entities, PIMCO, and the PIMCO Funds, all as defined in the Complaint.